



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

November 4, 2005

Certified Mail No. 7005 1160 0000 1550 0061

Cal Low
President
Low's Ready Mix, Inc.
2344 Dunvon
Eagle, ID 83616

RE: Facility ID No. 027-00094, Low's Ready Mix, Caldwell
Final Permit to Construct

Dear Mr. Low:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-050031 to Low's Ready Mix, Inc. for a new concrete batch plant. This permit is issued in accordance with IDAPA 58.01.01.200 through 228, Rules for the Control of Air Pollution in Idaho, and is effective immediately.

This permit does not release Low's Ready Mix, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of DEQ's Boise Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. In addition to your facility's plant manager, DEQ recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/HE/sd

Permit No. P-050031

Enclosures



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-050031

FACILITY ID No.: 027-00094

AQCR: 64

CLASS: SM

SIC: 3273

ZONE: 11

UTM COORDINATE (km): 532.2, 4834.9

1. PERMITTEE
Low's Ready Mix, Inc.

2. PROJECT
Initial Permit to Construct – Concrete Batch Plant

3. MAILING ADDRESS
2344 Dunvon

CITY
Eagle

**STATE
ID**

ZIP
83616

4. FACILITY CONTACT
Cal Low

TITLE
President

TELEPHONE
(208) 939-8884

5. RESPONSIBLE OFFICIAL
Cal Low

TITLE
President

TELEPHONE
(208) 939-8884

6. EXACT PLANT LOCATION
NW corner of SW ¼ SE ¼ Sec. 20, T 4 N, R 2W, approximately 5 miles east of
Caldwell, Idaho on U.S. Highway 20-26.

COUNTY
Canyon

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Concrete batch plant

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.


**TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: November 4, 2005

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
O&M	operations and maintenance
m	meter(s)
PM	particulate matter
PM₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
T/yr	tons per year
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050031

Permittee:	Low's Ready Mix, Inc.	Facility ID No. 027-00094	Date Issued:	November 4, 2005
Location:	Caldwell, Idaho			

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 This Permit to Construct (PTC) allows for the construction of a concrete batch plant. The concrete batch plant consists of three cement storage silos, cement batcher, central mix loading, sand, and aggregate handling.
- 1.2 This permit is the facility's initial permit to construct a concrete batch plant.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	<u>Concrete batch plant:</u> Manufacturer: Erie Strayer Company Maximum throughput rate: 260 cubic yard of concrete per hour (cy/hr) The major components of the plants are: Four-compartment aggregate bin 12 cubic yard aggregate batcher Three cement storage silos 12 cubic yard cement batcher 12 cubic yard tilt mixer	<u>Three silo dust collectors:</u> Manufacturer: C & W Model: LPR-6-S Filtration area (square feet): 267 Blower (CFM): 1,760 Cleaning mechanism: Pulse jet PM control efficiency: 99.99% <u>Central dust collector:</u> Manufacturer: C & W Model: Bp-790 Filtration area (square feet): 785 Blower (CFM): 5,000 Cleaning mechanism: Pulse jet PM control efficiency: 99.9% <u>Weigh batcher dust collector:</u> Manufacturer: C & W Model: CP-35 Filtration area (square feet): 36 Blower (CFM): 140 Cleaning mechanism: Pulse jet PM control efficiency: 99.99%

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2. CONCRETE BATCH PLANT**2.1 Process Description**

The facility is a central mix plant manufactured by Erie Strayer Company. The components of the plant are as follows: a four-compartment aggregate bin, a 12 cubic yard aggregate batcher, three cement storage silos, a 12 cubic yard cement batcher, and a 12 cubic yard tilt mixer. The plant combines sand, gravel, cement, and water to produce concrete.

2.2 Emissions Control Description**Table 2.1 CEMENT STORAGE SILO DESCRIPTION**

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Aggregate batcher, three cement storage silos, cement batcher, tilt mixer, and weigh hopper loading	Dust collectors	<u>Three silo dust collector stacks:</u> Each stack is with the following parameters: stack height: 84 ft Stack diameter: 3.67 ft Exit air flow: 1,760 actual cubic feet per minute (acfm) Exit temperature: 68 °F <u>Central dust collector stack:</u> The stack is with the following parameters: stack height: 23 ft Stack diameter: 2 ft Exit air flow: 5,000 acfm Exit temperature: 68 °F <u>Weigh batcher dust collector stack:</u> Emissions from the weigh batcher is routed to the central dust collector

Emissions Limits**2.3 Emissions Limits**

Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometer (PM₁₀) emissions from the silo dust collectors, the central dust collector, and the weigh batcher dust collector stacks shall not exceed 1.52 tons per any consecutive 12-month period.

2.4 Opacity Limit

The permittee shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than 20% opacity as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

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Operating Requirements**2.5 Throughput Limit**

The cement throughput from the three cement storage silos shall not exceed 642,283 tons per any consecutive 12-month period.

2.6 Pressure Drop Monitoring Devices

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, pressure drop monitoring devices to measure the pressure drop across each silo dust collectors, the central dust collector, and the weigh batcher dust collector.

2.7 Operations and Maintenance Manual

Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the silo storage dust collectors, the central dust collector, and the weigh batcher dust collector. The O&M manual shall describe the procedures that will be followed to comply with General Provision 3.2 and the manufacturer specifications for the dust collectors. The manual shall contain, at a minimum, the pressure drop range for each of the dust collectors. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

2.8 Pressure Drop Across the Dust Collectors

The pressure drop across each of the silo dust collectors, the central dust collector, and the weigh batcher dust collector shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

2.9 Dust Collectors Maintenance and Operation

The permittee shall maintain and operate each of the silo storage dust collectors, the central dust collector, and the weigh batcher dust collector according to manufacturer and O&M manual specifications and recommendations to demonstrate compliance with Permit Conditions 2.3 and 2.4 and General Provision 3.2.

2.10 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.

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- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

Monitoring and Recordkeeping Requirements**2.12 Throughput Monitoring**

The permittee shall monitor and record the cement throughput from the cement storage silos monthly and annually to demonstrate compliance with Permit Condition 2.5. Annual throughput shall be determined by summing each monthly throughput over the previous consecutive 12-month period. These records shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

2.13 Dust Collectors Pressure Drop Monitoring

Once per day when operating, the permittee shall monitor and record the pressure drop across the dust collectors to demonstrate compliance with Permit Condition 2.8. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within five working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

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All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.